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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 LASER DESIGN INTERNATIONAL, LLC and  
12 NORWOOD OPERATING COMPANY,

13 Plaintiffs,  
14  
15 v.  
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17 BJ CRYSTAL, INC., a California corporation;  
18 CRYSTAL MAGIC, INC., a Florida  
19 corporation; U.C. LASER, INC., a New Jersey  
20 corporation; VITRO LASER GROUP U.S.A.,  
21 INC., a Nevada corporation; JIMAC  
22 MARKETING, INC., a Canadian corporation;  
23 CONCORD INDUSTRIES, INC., a Connecticut  
24 corporation; CERION GMBH, a German limited  
liability company; CRYSTAL CAPTURE INC.,  
a Texas corporation; CRYSTAL CAPTURE  
INTERNATIONAL, LLC, a Nevada limited  
liability company; G.W. PARTNERS  
INTERNATIONAL, INC., a California  
corporation; VITRO LASER GMBH, a German  
limited liability company; VITRO  
INTERNATIONAL, LLC, a Nevada limited  
liability company; VITRO USA, LLC, a Nevada  
limited liability company; MERITAGE  
GRAPHICS, INC., a Nevada corporation;  
CRYSTAL LASER CONCEPTS, LTD., a  
Nevada limited liability company; 3DLI, Inc., a  
Nevada corporation; ART GOLDMAN; SCOTT  
STANKO; OTHMAR VAN DAM; and DOES  
1-19,

25  
26 Defendants.  
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AND RELATED COUNTERCLAIMS

Lead Case No. C 03-1179 JSW (MEJ)  
Consolidated with No. C 03-3905 JSW

**STIPULATION AND [PROPOSED]  
ORDER MODIFYING A COURT-  
ORDERED DEADLINE FOR DEPOSITION  
OF DEFENDANT CRYSTAL MAGIC, INC.**

1 Plaintiffs, Laser Design International, LLC and Norwood Operating Company  
2 ("Plaintiffs"), and Defendant, Crystal Magic, Inc., ("Crystal Magic"), by their undersigned  
3 counsel, hereby submit the following Stipulation Modifying a Court-Ordered Deadline for the  
4 Deposition of Defendant Crystal Magic, Inc. By and through counsel, Plaintiffs and Crystal  
5 Magic stipulate as follows:

6 1. By stipulation and court order, attached as Exhibit A, Crystal Magic was required to  
7 appear in the offices of plaintiffs' counsel for a deposition on or before March 31, 2006.

8 2. However, Crystal Magic has stated that its designated witness is unable to appear for  
9 this deposition in the month of March and Crystal Magic has therefore requested a modification  
10 of the deadline and an extension of time. The parties and their attorneys have agreed that April  
11 11, 2006 is a mutually convenient date for the deposition to occur.

12 3. Accordingly, for the convenience of Crystal Magic, the undersigned hereby stipulate  
13 that the deposition of Crystal Magic may occur on April 11, 2006.

14 Dated: March 27, 2006

15 COOLEY GODWARD LLP

16  
17 By: \_\_\_\_\_/s/ \_\_\_\_\_  
18 Brian E. Mitchell  
19 Attorneys for Plaintiffs  
Laser Design International, LLC  
and Norwood Operating Company

20 Dated: March 27, 2006

21 PERKINS COIE, LLP

22  
23 By: \_\_\_\_\_/s/ \_\_\_\_\_  
24 Scott Eads  
25 Attorneys for Defendants  
BJ Crystal, Inc., Crystal Magic, Inc., Crystal  
Capture, Inc., Jimac Marketing, Inc., Cerion  
GmbH, Concord Industries, Inc., and Vitro  
Laser GmbH

1  
2 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
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5 Dated: March 28, 2006  
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7 By: \_\_\_\_\_  
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9 HONORABLE JEFFREY S. WHITE  
10 United States District Judge  
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# **EXHIBIT A**

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 LASER DESIGN INTERNATIONAL, LLC and  
12 NORWOOD OPERATING COMPANY,

13 Plaintiffs,

14 v.

15 BJ CRYSTAL, INC., a California corporation; CRYSTAL MAGIC, INC., a Florida corporation; U.C. LASER, INC., a New Jersey corporation; VITRO LASER GROUP U.S.A., INC., a Nevada corporation; JIMAC MARKETING, INC., a Canadian corporation; CONCORD INDUSTRIES, INC., a Connecticut corporation; CERION GMBH, a German limited liability company; CRYSTAL CAPTURE INC., a Texas corporation; CRYSTAL CAPTURE INTERNATIONAL, LLC, a Nevada limited liability company; G.W. PARTNERS INTERNATIONAL, INC., a California corporation; VITRO LASER GMBH, a German limited liability company; VITRO INTERNATIONAL, LLC, a Nevada limited liability company; VITRO USA, LLC, a Nevada limited liability company; MERITAGE GRAPHICS, INC., a Nevada corporation; CRYSTAL LASER CONCEPTS, LTD., a Nevada limited liability company; 3DLI, Inc., a Nevada corporation; ART GOLDMAN; SCOTT STANKO; OTHMAR VAN DAM; and DOES 1-19,

26 Defendants.

27 AND RELATED COUNTERCLAIMS

28

Lead Case No. C 03-1179 JSW (MEJ)  
Consolidated with No. C 03-3905 JSW

**STIPULATION AND [PROPOSED]  
ORDER ALLOWING AMENDMENT OF  
DEFENDANT CRYSTAL MAGIC, INC.'S  
ANSWER TO SECOND AMENDED  
COMPLAINT**

**STIPULATION AND [PROPOSED] ORDER  
C 03-01179 JSW (MEJ)**



1 By and through counsel, Plaintiffs and defendant Crystal Magic, Inc. ("Crystal Magic")  
2 stipulate as follows:

3 1. Crystal Magic may file an amendment to its Answer to Plaintiffs' Second Amended  
4 Complaint, in the form of the attached Exhibit A, to add a Sixth Affirmative Defense.  
5 Correspondingly, Crystal Magic agrees to provide certain discovery, relating to this defense, as  
6 set forth herein.

7 2. Crystal Magic will provide responses and objections to Document Requests, in the  
8 form of the attached Exhibit B, and responsive, non-privileged documents will be produced, and  
9 privilege documents will be placed on a privilege log, within 30 days.

10 3. Crystal Magic will provide verified responses and objections to special interrogatories,  
11 in the form of Exhibit C, within 30 days. These special interrogatories will not count towards the  
12 limit on interrogatories, as that limit relates to interrogatories that are served on all of the  
13 defendants in this case.

14 4. Crystal Magic will provide a representative for a deposition, pursuant to Rule 30(b)(6)  
15 of the Federal Rules of Civil Procedure, on the topic of its Sixth Affirmative Defense. This  
16 deposition will take place in the offices of Cooley Godward LLP, San Francisco, California, prior  
17 to earlier of (1) the next mediation for this case or, (2) this case's discovery cut-off date.

18 5. Crystal Magic will file an amendment to its Answer to Plaintiffs' Second  
19 Amended Complaint, in the form of the attached Exhibit A, within 5 days from the date of entry  
20 of this Stipulation and [Proposed] Order by the Court.

21 Dated: January 30, 2006

22 COOLEY GODWARD LLP

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25 By: \_\_\_\_\_ /s/  
26 Brian E. Mitchell  
27 Attorneys for Plaintiffs  
28 LASER DESIGN INTERNATIONAL, LLC  
and NORWOOD OPERATING COMPANY

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1 Dated: January 30, 2006  
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5 PERKINS COIE LLP  
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10 By: /s/  
11 Kenneth B. Wilson  
12 Attorneys for Defendants  
13 BJ Crystal, Inc., Crystal Magic, Inc., Crystal  
14 Capture, Inc., Concord Industries, Inc.,  
15 Jimac Marketing, Inc., U.C. Laser, Inc.,  
16 Cerion GmbH, Vitro Laser GmbH and  
17 Meritage Graphics, Inc.  
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10 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
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13 Dated: February 1, 2006  
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16 By: *Jeffrey S. White*  
17 HONORABLE JEFFREY S. WHITE  
18 United States District Judge  
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